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Police Department and Captain Dori Koren

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PETER LYKINS, an individual; MARIA
LYKINS, an individual,

Plaintiffs,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, in its official capacity;
DORI KOREN, as an individual and in his
capacity as a Las Vegas Metropolitan Police
Department Officer; DOE OFFICERS 1-15,
as individuals and in their capacity as Las
Vegas Metropolitan Police Department
Officers; and ROE DEFENDANTS 1-10,

Defendants.

Case Number:
2:22-cv-01068-APG-BNW

**STIPULATION AND ORDER TO STAY
DISCOVERY AND OTHER
DEADLINES PENDING SETTLEMENT
DISCUSSIONS**

(FIRST REQUEST)

Plaintiffs Peter Lykins and Maria Lykins (“Plaintiffs”), by and through their counsel of record, Lisa A. Rasmussen., Esq. and Richard Bryant, Esq., of Law Offices of Kristina Wildeveld & Associates and Defendants Las Vegas Metropolitan Police Department (“LVMPD”) and Captain Dori Koren (“Koren”) (hereinafter “LVMPD Defendants”), by and through their attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm of Marquis Aurbach Coffing, (collectively the “Parties”), and hereby agree and jointly stipulate the following:

1. During a recent telephone to discuss discovery, including production of Body Worn Camera videos conducted in January 2023, the Parties determined that this matter may be appropriate for possible resolution and that a stay of discovery and other deadlines would

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1 allow the Parties to explore the possibility of settlement, without incurring the time and
2 expense of ongoing discovery and other work during settlement discussions.

3 2. The Parties agree that all deadlines in this matter be stayed for a forty-five
4 (45) day period. Parties further agree that within fifteen (15) days after completion of the
5 contemplated settlement discussions, if not successful, the parties will submit a stipulated
6 schedule regarding any pending motions or discovery which will extend all applicable dates
7 for the commensurate time period that they were stayed in accordance with Rule 26 of the
8 Federal Rules of Civil Procedure and Rule 26-1 of the Local Rules of the United States
9 District Court, for the Court's approval.

10 3. Given the amount of Body Worn Camera videos at issue, LVMPD will
11 continue to review the videos and supplement disclosures in accordance with Rule 26.

12 4. Accordingly, the Parties hereby agree and request the Court to enter a stay of
13 all deadlines in the instant case.

14 5. This is the Parties' first request for a stay of deadlines in this matter.

15 6. Notwithstanding the stay, the Parties intend to and hereby agree to cooperate
16 in the exchange of information as needed to facilitate settlement.

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7. The Parties both submit that the instant stipulation is being offered in good faith and not for the purpose of delay.

IT IS SO STIPULATED.

DATED this 17th day of January, 2023

DATED this 17th day of January, 2023

LAW OFFICES OF KRISTINA
WILDEVELD & ASSOCIATES

MARQUIS AURBACH COFFING

By: /s/ Lisa A. Rasmussen
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Captain Dori Koren

ORDER

IT IS ORDERED that ECF No. 25 is GRANTED.

IT IS FURTHER ORDERED that a stipulation to
dismiss or proposed scheduling order is due by
March 20, 2023.

IT IS SO ORDERED

DATED: 12:54 pm, January 18, 2023



BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed the foregoing **STIPULATION AND ORDER TO STAY DISCOVERY AND OTHER DEADLINES PENDING SETTLEMENT DISCUSSIONS (FIRST REQUEST)** with the Clerk of the Court for the United States District Court by using the court's CM/ECF system on the 17th day of January, 2023.

☒ I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

☐ I further certify that some of the participants in the case are not registered CM/ECF users. I have mailed the foregoing document by First-Class Mail, postage prepaid, or have dispatched it to a third party commercial carrier for delivery within 3 calendar days to the following non-CM/ECF participants:

N/A

/s/ Krista Busch

An employee of Marquis Aurbach

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